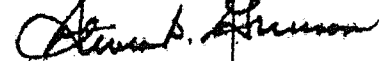


EXHIBIT A

Electronically Filed
2/15/2022 4:41 PM
Steven D. Grierson,
CLERK OF THE COURT



1 **COMP**

2 **DAVID A. TANNER, Esq.**

3 Nevada Bar No. 8282

4 **TANNER LAW FIRM**

5 7895 West Sunset Road, Suite 115

6 Las Vegas, NV 89113

7 Telephone (702) 987-8888

8 Facsimile (702) 410-8070

9 david@tannerlawfirm.com

10 *Attorney for Plaintiff*

CASE NO: A-22-848351-C

Department 19

11 **DISTRICT COURT**

12 **CLARK COUNTY, NEVADA**

13 SONIA VERA GUERRERO, an individual,

14 Plaintiff,

15 vs.

16 COSTCO WHOLESALE CORPORATION
17 dba COSTCO WHOLESALE, a foreign
18 corporation; DOES I through X; and ROE
19 ENTITIES I through X,

20 Defendants.

CASE NO.

DEPT. NO.

COMPLAINT

21 **COMPLAINT**

22 COMES NOW, Plaintiff, SONIA VERA GUERRERO, by and through her attorney,
23 David A. Tanner, Esq. of the Tanner Law Firm, and complains and alleges against Defendants,
24 and each of them, as follows:
25
26
27
28

THE PARTIES

1
2 1. This Court has jurisdiction over this matter under NRS 14.065 and NRS 4.370(1),
3 as the facts alleged occurred in Clark County, Nevada and involve an amount in controversy in
4 excess of \$15,000.00. Venue is proper pursuant to NRS 13.040, as Defendant, or any one of them
5 resided in Clark County, Nevada at the commencement of this action.

6 2. At all times relevant hereto, Plaintiff, SONIA VERA GUERRERO ("Sonia" or
7 "Plaintiff"), is and was a resident of Clark County, Nevada.

8 3. At all times relevant hereto, Defendant, COSTCO WHOLESALE
9 CORPORATION dba COSTCO WHOLESALE ("Costco"), is and was a foreign corporation and
10 was licensed to and was conducting business in Clark County, Nevada.

11 4. Plaintiff believes that Costco owned, operated, maintained, and managed the
12 Costco Wholesale located in Clark County, Nevada.

13 5. Costco Wholesale is located at 6555 Decatur Boulevard, Las Vegas, NV 89131.

14 6. The true names and capacities, whether individual, corporate, associate, or
15 otherwise of Defendants Does I through X and Roe Corporations I through X are unknown to
16 Plaintiff at this time, who therefore sues said Defendants by such fictitious names. Plaintiff is
17 informed and believes and therefore alleges that each of the Defendants designated as Does and
18 Roe Entities are responsible in some manner for the events and happenings referred to as alleged
19 herein, whether by actually or have responsibility for creating the hazard, failing to warn of the
20 hazard, owning, managing, maintaining, inspecting, cleaning, supervising, or controlling the
21 premises, or in some other manner as set forth herein. Plaintiff will seek leave of the Court to
22 amend this Complaint to insert the true names and capacities of Does I through X and Roe Entities
23 I through X when the same have been ascertained and to join such Defendants in this action.

24
25 **GENERAL ALLEGATIONS**

26 7. On or about September 15, 2020, Plaintiff was at Costco Wholesale, located at
27 6555 Decatur Boulevard, Las Vegas, NV 89131.

1 8. Plaintiff was legally on the premises of Costco Wholesale at the time of this
2 incident.

3 9. At all times relevant herein, the Defendants were the owners, managers,
4 maintainers, inspectors, supervisors, or controllers of the premises where Plaintiff was located.

5 10. Plaintiff believes that at all times relevant herein, the Defendants and each of them
6 were the employees or agents of the other Defendants and were acting in the course and scope of
7 their employment or agency.

8 11. While walking in the food station area near the soda machines, Sonia encountered
9 liquid on the floor.

10 12. This liquid on the floor that Plaintiff encountered caused her to slip and fall causing
11 severe and debilitating injuries to herself.

12 13. Plaintiff believes that Defendants have a policy that all areas of Costco Wholesale
13 including the cash registers must be routinely inspected, maintained, and cleaned so they are kept
14 safe and in good repair or warnings used to ensure patrons, such as Plaintiff, are not harmed.

15 14. Plaintiff believes that the Defendants understand that liquid on the floor is a
16 hazardous condition and can lead to a patron being injured.

17 15. On or about September 15, 2020, Defendants, and each of them, while in the
18 course and scope of their employment and agency with other Defendants, negligently failed to
19 maintain, manage, inspect, clean, supervise, control, and repair the premises and further failed to
20 warn Plaintiff of hazards which resulted in Plaintiff's injuries.

21 16. Defendants' personnel did not use warnings to alert patrons, such as Plaintiff, of
22 the hazardous condition.

23 **FIRST CAUSE OF ACTION**
24 **(Negligence)**

25 17. Plaintiff hereby incorporates the allegations set forth above in paragraphs 1
26 through 16 as though fully set forth herein.

18. Defendants had a duty to maintain, manage, inspect, clean, supervise, control, and repair the premises and associated equipment to ensure that no hazards existed that could harm a patron. Defendants had a duty to warn of hazards such as liquid on the floor.

19. Defendants breached these duties, which breached proximately cause harm to Plaintiff.

20. As a result of Defendants' conduct, Plaintiff has suffered damages, and Plaintiff is entitled to damages in excess of \$15,000.00.

21. As a result of Defendants' conduct, as set forth herein, Plaintiff has been required to retain the services of an attorney, and, as a direct, natural, and foreseeable consequence thereof, has been damaged thereby, and is entitled to reasonable attorneys' fees and costs.

WHEREFORE, Plaintiff requests that this Court enter judgment against Defendants as follows:

1. General damages in an amount in excess of \$15,000.00;
2. Special damages in an amount in excess of \$15,000.00;
3. Costs of suit and attorneys' fees;
4. For judgment for interest; and
5. For such other and further relief as this Court deems just and proper.

Dated this 15 date of February, 2022

By: 

David A. Tanner, Esq.
Nevada Bar No. 8282
TANNER LAW FIRM
7895 W. Sunset Road, Suite 115
Las Vegas, NV 89113
Telephone (702) 987-8888
Facsimile (702) 410-8070
david@tannerlawfirm.com
Attorney for Plaintiff